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Attorney for RANDALL HEATH

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

CAMERON ROSS WALDRON,
RANDALL HEATH,
CHRISTIAN HEATH,
JENNIFER JENSEN,
PAUL HILSE,
ROBERT BLACKBURN,
CHRISTOPHER TOWNSEND, and
ROBERT LOVATO

Defendants.

**MOTION OF DEFENDANT,
RANDALL HEATH, TO
RECONSIDER DETENTION AND
FOR RELEASE PENDING TRIAL**

Case No. 2:18-CR-00031-TC-EJF

Magistrate Judge Evelyn J. Furse

Judge Tena Campbell

Defendant, Randall Heath, by and through his counsel of record Mary C. Corporon, hereby moves and petitions the above-entitled Court for an order modifying the terms and conditions of Defendant, Randall Heath's detention in this case, and to authorize the release of

Defendant, Randall Heath, upon reasonable conditions, pending trial in this matter. In support of this motion, said Defendant asserts as follows:

It is clear that resolution of discovery issues in this case and resolution of this matter, including pretrial motions, will involve many more months, prior to trial. The production of evidence in this case has involved the production of extraordinarily voluminous material, for which defense counsel have received assistance of a paralegal. Defense counsel have just received the discovery material, organized appropriately for review, in the past ten days. The time necessary to review the materials produced will be extensive. Given the complexity of this matter, and the time that will be required before resolution of this matter, it is appropriate that said Defendant, Mr. Heath, now be released, subject to appropriate conditions of supervision, including potentially residence in a "half-way house."

DATED this 4th day of September, 2018.

/s/ Mary C. Corporon
MARY C. CORPORON,
Attorney for Defendant, Randall Heath

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of September, 2018, I filed a true and correct copy of the foregoing with the Clerk of the Court using CM/ECF system, which sent notification of foregoing to all those registered with CM/ECF to receive notices in the instant case.

/s/ Michelle D. Donohoo